

HEATHER E. WILLIAMS, SBN 122664  
Federal Defender  
HOOTAN BAIGMOHAMMADI, SBN 279105  
Assistant Federal Defender  
Designated Counsel for Service  
801 I Street, Third Floor  
Sacramento, CA 95814  
T: (916) 498-5700  
F: (916) 498-5710

Attorneys for Defendant  
Mr. Trejo

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 2:24-cr-69-TLN-1
	)
Plaintiff,	) <b>STIPULATION AND ORDER TO CONTINUE</b>
	) <b>JUDGMENT AND SENTENCING</b>
vs.	)
	) Date: August 21, 2025
MANUEL TREJO.	) Time: 9:30 a.m.
	) Judge: Hon. Troy L. Nunley
Defendants.	)
_____	)

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Eric Grant, through Assistant United States Attorneys Kristin Scott, counsel for Plaintiff; and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Manuel Trejo that the Judgment and Sentencing currently set for August 21, 2025 at 9:30 be continued to September 4, 2025 at 9:30 a.m.

The parties specifically stipulate as follows:

- Mr. Trejo moves to continue the sentencing for compelling reasons. First, he needs additional time to gather mitigation material. Second, he is housed at Colusa County Jail (over an hour away from the Federal Defender office) which makes it difficult for defense counsel to meet with him. Finally, Defense counsel's Duty calendar responsibilities for the past two days have further hampered his ability to consult with Mr. Trejo and prepare for sentencing.

Yesterday, defense counsel had to travel after-hours to visit Mr. Trejo due to Duty responsibilities. Today, defense counsel had an unanticipated Duty assignment due to Ms. Sinha's departure from the Federal Defender office. This is Mr. Trejo's first request to continue sentencing. It is a modest, two-week request.

2. Neither the government nor U.S. Probation object to the following modified sentencing schedule:

<b>Draft PSR</b>	completed
<b>Informal Objections</b>	completed
<b>Final PSR</b>	completed
<b>Formal Objections</b>	completed
<b>Response to Formal Objections</b>	August 28, 2025
<b>Judgment and Sentencing</b>	September 4, 2025

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: August 14, 2025

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Mr. Trejo

Date: August 14, 2025

ERIC GRANT  
United States Attorney

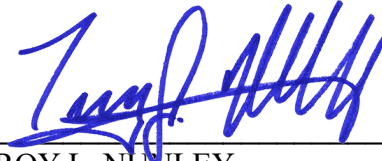
/s/ Ross Pearson for  
KRISTIN SCOTT  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: August 17, 2025



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TROY L. NUNLEY  
CHIEF UNITED STATES DISTRICT JUDGE